

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-2738-  
FLW-LHG**

**MDL No. 2738**

***THIS DOCUMENT RELATES TO ALL CASES***

**CERTIFICATION OF MICHELLE A. PARFITT, ESQ.**

Michelle A. Parfitt, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Ashcraft & Gerel, LLP. I was appointed as Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.
2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Omnibus Brief Regarding *Daubert* Legal Standard and Scientific Principles for Assessing General Causation.
3. Attached hereto as Exhibit A is a true and correct copy of Hill, *The Environment and Disease: Association or Causation?*, 58 Proc. Royal Soc'y Med. 295 (1965).
4. Attached hereto as Exhibit B is a true and correct copy of excerpts from Lilienfeld, et al., *FOUNDATIONS OF EPIDEMIOLOGY* 263-266 (3d ed. 1994).

5. Attached hereto as Exhibit C is a true and correct copy of Cranor, et. al., *Judicial Boundary Drawing and the Need for Context-Sensitive Science in Toxic Torts After Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 16 Va. Env'tl. L.J. 1, 42–49 (1996).

6. Attached hereto as Exhibit D is a true and correct copy of Krimsky, *The Weight of the Scientific Evidence in Policy and Law*, 95 Am. J. Public Health S129, S129 (2005).

7. Attached hereto as Exhibit E is a true and correct copy of Vitonis, et al. *Assessing Ovarian Cancer Risk When Considering Elective Oophorectomy at the Time of Hysterectomy*, *Obstetrics and Gynecology*, 2011;117(5):1042–50.

8. Attached hereto as Exhibit F is a true and correct copy of Hunn, et al. *Ovarian Cancer: Etiology, Risk Factors, and Epidemiology*, *Clinical Obstetrics and Gynecology*, 2012;55(1):3–23.

9. Attached hereto as Exhibit G is a true and correct copy of Mallen, et al., *Risk Factors for Ovarian Carcinoma*, *Hematology/Oncology Clinics of North America*, 2018.

10. Attached hereto as Exhibit H is a true and correct copy of Park, et al. *Benign Gynecologic Conditions Are Associated with Ovarian Cancer Risk in African-American Women: A Case–Control Study*, *Cancer Causes & Control*, Sept. 2018.

11. Attached hereto as Exhibit I is a true and correct copy of Rothman, *Six Persistent Research Misconceptions*, J Gen Intern, Med, 2014;29(7):1060-4.

12. Attached hereto as Exhibit J is a true and correct copy of Amrhein, et al., *Scientists Rise Up Against Statistical Significance*, Nature 567, 305-307 (March, 2019).

13. Attached hereto as Exhibit K is a true and correct copy of Black, et al., *Epidemiologic Proof in Toxic Tort Litigation*, 52 Fordham L. Rev. 732, 750 (1984).

14. Attached hereto as Exhibit L is a true and correct copy of excerpts from Oleckno, *EPIDEMIOLOGY: CONCEPTS AND METHODS* (2008).

15. Attached hereto as Exhibit M is a true and correct copy of Draft Screening Assessment, Talc, Environment and Climate Change Canada, Health Canada, December 2018.

16. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: May 7, 2019

/s/ Michelle A. Parfitt  
Michelle A. Parfitt